

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF DELAWARE

THOMAS A. EAMES, ROBERTA L. EAMES)	
and TAMMY EAMES, on behalf of)	
themselves and all others similarly)	
situated,)	
Plaintiffs,)	Civil Action No. 04-CV-1324-KAJ
)	
v.)	
)	
NATIONWIDE MUTUAL INSURANCE)	
COMPANY,)	
Defendant.)	

**DEFENDANT'S RESPONSES AND OBJECTIONS TO PLAINTIFFS'
FEBRUARY 14, 2006 RULE 30(b)(6) MATTERS FOR EXAMINATION**

Defendant, Nationwide Mutual Insurance Company ("Nationwide"), responds as follows to the Rule 30(b)(6) Matters for Examination designated by Plaintiffs on February 14, 2006 ("Plaintiffs' Designation") in connection with class discovery in this matter.

This response is served subject to and without waiver of Nationwide's timely filed Motion to Dismiss Plaintiffs' Amended Complaint, and subject to and without waiver of any motion to stay class discovery that Nationwide may file. Nationwide further reserves the right to assert appropriate additional objections in light of the more limited scope of this action as a result of the Court's dismissal, with prejudice, of Plaintiffs' contract and declaratory claims, as well as rulings upon issues arising from Plaintiffs' purported Amended Complaint.¹

¹ Plaintiffs' designations in their February 14, 2006 notice are the same as those they previously designated prior to the Order dismissing their contract and declaratory claims with prejudice, and dismissing their consumer fraud and civil conspiracy claims with leave to amend. Nationwide is therefore filing the same objections that it previously asserted merely to protect the record in this regard.

Objections to Definitions

Nationwide objects to the definition of "disputed practice" contained in Plaintiffs' Designation as overbroad and vague and ambiguous.

Responses to Matters for Examination

Subject to and without waiver of the above reservations and objections to definitions, Nationwide further responds as follows to the corresponding numbered paragraphs of Plaintiffs' Designation:

1. Patricia A. Szlosek, Compliance Consultant Manager, Underwriting Staff Compliance, will testify as to the subjects identified in this paragraph.
2. Patricia A. Szlosek will testify as to the subjects identified in this paragraph.
3. Nationwide objects to this paragraph as beyond the scope of subjects properly designated for testimony by a representative of Nationwide. The Glenn Deaton Agency, Inc. is a separate and distinct entity from Nationwide.
4. Patricia A. Szlosek will testify as to the subjects identified in this paragraph.
5. Peter Oesterling, Esquire, V.P. Office of General Counsel, E-Discovery Liaison for this litigation will testify as to the subjects identified in this paragraph.
6. Nationwide objects to this paragraph to the extent that the documents produced by Nationwide speak for themselves as to their nature and content. Subject to and without waiver of this objection, Patricia A. Szlosek will testify as to the subjects identified in this paragraph.
7. Nationwide objects to this paragraph as beyond the scope of subjects properly designated for testimony by a representative of Nationwide. The entities set forth in this paragraph are separate and distinct entities from Nationwide. Nationwide further

objects to this paragraph to the extent that the documents produced by these entities speak for themselves as to their nature and content.

8. Nationwide objects to this paragraph as overly broad, unduly burdensome, seeking confidential and proprietary information and beyond the scope of permissible class discovery as allowed by the Court at this stage.

9. Nationwide objects to this paragraph as overly broad, unduly burdensome, seeking confidential and proprietary information and beyond the scope of permissible class discovery as allowed by the Court at this stage.

10. Nationwide will provide the information requested in this paragraph to counsel for Plaintiffs.

11. Nationwide will provide the information requested in this paragraph to counsel for Plaintiffs.

12. Nationwide will provide the information requested in this paragraph to counsel for Plaintiffs.

13. Nationwide objects to this request as vague and ambiguous and overly broad. Subject to and without waiver of these objections, Peter Oesterling will testify as to the subjects identified in this paragraph.

SWARTZ CAMPBELL LLC

/s/Nicholas E. Skiles, Esquire

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